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Attorney for Petitioner

By: Emanuel S. Asmar  
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(973) 648-2893

STATE OF NEW JERSEY  
BUREAU OF SECURITIES  
153 Halsey Street, 6th Floor  
P.O. Box 47029  
Newark, New Jersey 07101  
(973) 504-3600

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IN THE MATTER OF

WILK FINANCIAL SERVICES INC.

CRD # 147618

Respondent.

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**ADMINISTRATIVE CONSENT ORDER**

OAL Docket No. BOS 13784-2010 N

Pursuant to the authority granted to the Chief of the New Jersey Bureau of Securities ("Bureau Chief") by the Uniform Securities Law (1997), N.J.S.A. 49:3-47 et seq., ("Securities Law"), and after investigation, review and due consideration of the facts involving Wilk Financial Services Inc., Wilk Financial Services Inc. and the Bureau Chief now desire to resolve this matter and consent to the form and entry of this Consent Order.

**Findings of Facts and Conclusions of Law**

The Bureau Chief makes the following findings of fact and conclusions of law, which

Wilk Financial Services Inc. neither admits nor denies:

1. Wilk Financial Services Inc. (CRD# 147618) has been registered with the Bureau as an investment adviser from July 28, 2008 to present.
2. On October 29, 2009, the Bureau sent an Investment Adviser Renewal form to Wilk Financial Services Inc. via e-mail to joshuabwilkcpa@gmail.com, which the firm listed as its contact e-mail address on the Investment Adviser Registration Depository ("IARD"), an electronic database upon which registrants are obligated to maintain current contact information. The Bureau did not receive an email indicating a failure to deliver the email to the aforementioned e-mail address.
3. The October 29, 2009 cover e-mail advised, in pertinent part, "Please find enclosed the renewal for the year ending December 31, 2010, which must be received at the Bureau on or before December 31, 2009 . . . ."
4. By e-mail dated December 11, 2009 to joshuabwilkcpa@gmail.com, the Bureau wrote, in pertinent part, "Attached is another copy of the 2010 IA Renewal application. All IA renewals are due and must be received by the New Jersey Bureau of Securities by e-mail on or before December 31, 2009 . . . Failure to submit the required paperwork in a timely manner will terminate your registration despite payment of fees, and may be subject to a late fee . . . ." The Bureau did not receive an email indicating a failure to deliver the email to the aforementioned e-mail address.
5. By December 31, 2009, Wilk Financial Services Inc. failed to timely submit the Investment Adviser Renewal Form. On March 16, 2010, the Bureau sent a letter via U.S. certified mail, return receipt requested and regular mail to Wilk Financial Services Inc. at

132 Park Avenue, Passaic, NJ 07055, enclosing the Investment Adviser Renewal form, referred to as the Investment Adviser Renewal Questionnaire in this letter. The firm listed this address as its contact address on the IARD ("IARD Address").

6. The March 16, 2010 letter advised that it was "a formal request for information and documentation pursuant to the statutory and regulatory powers of the Chief of the New Jersey Bureau of Securities including, but not limited to, N.J.S.A. 49:3-59, N.J.S.A. 49:3-68, and N.J.A.C. 13:47A-14.14." The March 16, 2010 letter further advised, "You are required to answer each question accurately and return the Questionnaire, together with any required documentation, which must be received within 21 days of the date of this letter at New Jersey Bureau of Securities . . . If you fail to return the completed Questionnaire within 21 days, the New Jersey Bureau of Securities may proceed with an action to revoke or suspend your investment adviser registration and/or assess civil monetary penalties, pursuant to N.J.S.A. 49:3-58 and N.J.A.C. 13:47A-14.16."
7. The March 16, 2010 return receipt shows that the certified letter was received by Wilk Financial Services Inc. on March 19, 2010. The return receipt was signed, without a date, by "Nora Wilk" and returned to the Bureau. The United States Postal Service "track & confirm" search results generated from the U.S. Postal Service website ([www.usps.com](http://www.usps.com)) indicates that the March 16, 2010 letter was delivered on March 19, 2010. The regular U.S. mail was not returned to the Bureau.
8. Wilk Financial Services Inc. failed to submit the Investment Adviser Renewal form in response to the March 16, 2010 letter.
9. On July 26, 2010, Joseph Blanco, IA Section Supervisor at the Bureau, called Joshua

Wilk, the individual in Wilk Financial Services Inc.'s IARD filing as the firm's contact person. Mr. Blanco left a voice message requesting that Mr. Wilk return his call. On August 2, 2010, Mr. Wilk called Mr. Blanco and left a voice message for Mr. Blanco in which Mr. Wilk requested that a renewal form be resent to him. On August 2, 2010, Mr. Blanco called Mr. Wilk and left Mr. Wilk a voice message requesting that Mr. Wilk call back and discuss the matter.

10. Mr. Wilk failed to call Mr. Blanco. Wilk Financial Services Inc. failed to submit the Investment Adviser Renewal form.
11. Wilk Financial Services Inc., as a registered investment adviser, was required to cooperate with the Bureau in any inquiry, investigation or inspection pursuant to N.J.A.C. 13:47A-14.16.
12. Wilk Financial Services Inc. failed to cooperate with the Bureau by failing to submit the Investment Advisor Renewal form to the Bureau by December 31, 2009.

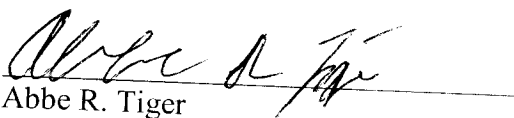
**THEREFORE**, it is on this 6<sup>TH</sup> day of SEPTEMBER, 2011, **ORDERED AND AGREED** that:

13. Wilk Financial Services Inc. is assessed a civil monetary penalty in the amount of \$1,500 pursuant to N.J.S.A. 49:3-70.1 for its failure to cooperate in violation of N.J.A.C. 13:47A-14.16. The \$1,500 shall be received at the Bureau no later than August, 31 2011.
14. Payment shall be made by attorney trust fund check, certified check or other guaranteed funds, payable to the "Bureau of Securities, State of New Jersey" and delivered to the attention of the Bureau Chief, at the following address: Bureau of Securities, 153 Halsey Street, 6th Floor, Newark, New Jersey 07102.

15. Wilk Financial Services Inc. shall complete the Investment Adviser Renewal form for calendar year 2010. The completed Investment Adviser Renewal form shall be received by the Bureau together with the \$1,500 payment described in paragraphs 13 and 14.
16. Wilk Financial Services Inc. shall cease and desist from future violations of the Securities Law.

### **GENERAL PROVISIONS**


17. The individual signing this Consent order represents that he/she is authorized to sign this Consent Order on behalf of Wilk Financial Services Inc.
18. Wilk Financial Services Inc., by the signature below, in consideration of its desire to resolve the issues herein and having full opportunity to consult with counsel, hereby consents to the jurisdiction of the Bureau and voluntarily waives any right to assert any defenses, or to raise any challenge that it otherwise may have had to this Administrative Consent Order.
19. This Administrative Consent Order shall not bind any person not a party thereto.  
Respondent has read this Administrative Consent Order, understands it, and agrees to be bound by its terms.
20. Wilk Financial Services Inc. agrees that for purposes of this matter or future proceedings to enforce this Administrative Consent Order that this Administrative Consent Order shall have the same effect as if proven and ordered after a full hearing pursuant to N.J.S.A. 52:14B-1 et seq.

  
Abbe R. Tiger  
Chief, New Jersey Bureau of Securities

WE HEREBY CONSENT TO THE FORM  
AND ENTRY OF THE ABOVE ORDER:


PAULA T. DOW  
ATTORNEY GENERAL OF NEW JERSEY

DATE: 9/2/2011

By:   
Emanuel S. Asmar  
Deputy Attorney General

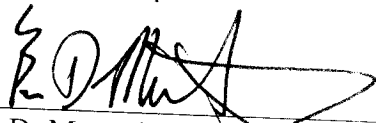
Wilk Financial Services Inc.

DATE: 8/26/2011

By:   
Joshua B. Wilk  
Title: CEO

Manevitz Law Firm LLC  
Attorney for Respondent

DATE: 8/26/2011

By:   
Ben D. Manevitz, Esq.